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January 13, 2017

*By Electronic Filing*

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

Re: *Wims v. River Park Residences, L.P., et al.*, 15-CV-04269 (VSB)

Dear Judge Broderick:

This Office represents the New York State Division of Housing and Community Renewal (“DHCR”) in the above-referenced action. This Court recently scheduled a pre-motion conference for January 19, 2017, to discuss DHCR’s proposed motion to dismiss and request to stay discovery pending resolution of its anticipated motion. (Docket No. 46.) Under the terms of the proposed revised case management plan, however, the parties’ initial disclosures under Rule 26 of the Federal Rules of Civil Procedure are due to be served on January 17, 2017 (Docket No. 45-1)—two days before the pre-motion conference.

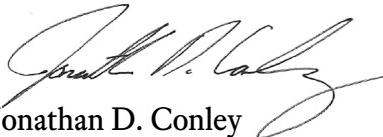
Consequently, we write with plaintiff’s consent to advise the Court that, unless the Court directs otherwise, plaintiff and DHCR have agreed that the date for DHCR to serve initial disclosures will be extended until its request to stay discovery is considered by the Court at the January 19, 2017 pre-motion conference. If the Court denies DHCR’s request to stay discovery at the pre-motion conference, DHCR will serve initial disclosures by January 27, 2017.

We appreciate the Court’s attention to this matter.

The Honorable Vernon S. Broderick  
January 13, 2017

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Respectfully,

  
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